

**To:** Daly, Carl[Daly.Carl@epa.gov]  
**Cc:** Morales, Monica[Morales.Monica@epa.gov]; Dresser, Chris[Dresser.Chris@epa.gov]; Fallon, Gail[fallon.gail@epa.gov]; Ostendorf, Jody[ostendorf.jody@epa.gov]; Stoneman, Chris[Stoneman.Chris@epa.gov]; Beeler, Cindy[Beeler.Cindy@epa.gov]  
**From:** Smith, Claudia  
**Sent:** Thur 11/3/2016 10:39:19 PM  
**Subject:** RE: Status of OMB Review of U&O FIP

As an update to the summary of Utah's draft proposed PBR that I provided Carl and Monica yesterday, Chris and I just finished a phone call with Sheila Vance and Brock Lebaron at UDAQ and discovered that some of my interpretation of the drafts provided to stakeholders was not as UDAQ intended and they were glad to have the feedback that their intent was unclear as drafted.

The draft proposed language was intended to require emissions control where combined VOC emissions of the tank battery and any dehy is greater than or equal to 4 tpy, so while this could pull in a source that only has a dehy and no tanks into control requirements if the individual dehy emits at least 4 tpy, it was not intended to limit the control requirements only to dehy's. It was also not the intent to imply that only individual tanks with PTE at least 6 tpy would need to be controlled by referring to the definition of storage vessel in NSPS OOOO and OOOOa. UDAQ's intent was the same as what they currently consider BACT for minor sources. Therefore, our FIP proposal

## **Ex. 5 - Deliberative Process**

Additionally, UDAQ's intent for the draft proposal was to align LDAR frequency with NSPS OOOOa (quarterly for compressor stations and semi-annually for well sites), which also was unclear in the draft. The proposal would require that LDAR program for sources with the combined tank and dehy emissions greater than or equal to 4 tpy

## **Ex. 5 - Deliberative Process**

decided not to touch on pneumatic pumps in the draft proposal, because the inventory identified less than 10 pumps at all of the state sources.

## **Ex. 5 - Deliberative Process**

currently on UDAQ's books. They mentioned that their permit engineers have been

seeing significant emissions from loading and unloading and have been considering stage 1 vapor recovery or routing to a flare as BACT in more recent permits.

Brock mentioned that they are in the very early stages of developing the proposal, so these draft requirements may change.

## Ex. 5 - Deliberative Process

Thanks,

Claudia

**From:** Smith, Claudia

**Sent:** Wednesday, November 02, 2016 5:09 PM

**To:** Daly, Carl <Daly.Carl@epa.gov>

**Cc:** Morales, Monica <Morales.Monica@epa.gov>; Dresser, Chris <Dresser.Chris@epa.gov>; Fallon, Gail <fallon.gail@epa.gov>

**Subject:** Re: Status of OMB Review of U&O FIP

I meant to get back to you on my review sooner and it escaped my train of thought, I apologize.

I did not run across anything too surprising given that they previously told us verbally that they wanted to align more with NSPS OOOO in the PBR they were developing. As you pointed out, the draft documents indicated UDAQ will be proposing 95% VOC control from tanks and dehys. as opposed to 98% in current existing source permits and the GAO, **Ex. 5 - Deliberative Process** One new thing is that sources required to control emissions from storage tanks are proposed to be required to control

emissions from truck loading with a stage 1 vapor recovery system or routing to a flare.

**Ex. 5 - Deliberative Process** Their proposal calls for semi-annual LDAR, it appears for all sources, **Ex. 5 - Deliberative Process**

**Ex. 5 - Deliberative Process** Their proposal calls for control of dehy's with greater than 4 tpy VOC emissions alone, but appears to require control of tanks in accordance with NSPS OOOO, moving away from their previous combined tank/dehy/pumps emissions threshold of 4 tpy.

Claudia

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**From:** Daly, Carl  
**Sent:** Wednesday, November 2, 2016 4:45:18 PM  
**To:** Smith, Claudia  
**Cc:** Morales, Monica; Dresser, Chris; Fallon, Gail  
**Subject:** FW: Status of OMB Review of U&O FIP

Claudia

Monica and I are updating Bert tomorrow on the FIP and we will also be talking about a near term action plan for when OMB releases the draft. Did your review of the draft UT permit-by-rule show anything surprising? **Ex. 5 - Deliberative Process**

Thanks

Carl Daly, Director

Air Program

303-312-6416

**From:** Daly, Carl  
**Sent:** Wednesday, November 02, 2016 2:43 PM  
**To:** Monica Morales <[Morales.Monica@epa.gov](mailto:Morales.Monica@epa.gov)>; Claudia Smith <[Smith.Claudia@epa.gov](mailto:Smith.Claudia@epa.gov)>;

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**Subject:** Status of OMB Review of U&O FIP

I just talked to Mike Koerber in OAQPS to see if he had heard where OMB was on reviewing the additional information we sent them on the draft U&O proposed rule and RIA. He will ask OP (Kevin R) to bring it up to OMB tomorrow on a regularly scheduled call they have.

Mike also understood that OMB had sent our additional information out for interagency review with a deadline of the end of last week to hear back from the other agencies (even though the additional information was generally in response to OMB's issues, not other agencies).

Carl Daly, Director

Air Program

303-312-6416